

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JANE DOE, on her own behalf, on behalf
of her husband, John Doe, and on behalf of
all others similarly situated,

Plaintiff,

v.

UNITEDHEALTH GROUP INC.,
UNITED HEALTHCARE INSURANCE
CO., OXFORD HEALTH PLANS, LLC,
OXFORD HEALTH PLANS (NY), INC.,
and OXFORD HEALTH INSURANCE,
INC.,

Defendants.

Civil Action No. 1:17-cv-4160

**NOTICE OF SETTLEMENT, JOINT
MOTION TO STAY, AND JOINT REQUEST
TO VACATE MAY 3, 2021 STATUS
CONFERENCE**

Plaintiff Jane Doe (“Plaintiff”) and Defendant Oxford Health Insurance, Inc. (“OHI” or “Defendant”) (collectively, the “Parties”) hereby provide notice that they have agreed in principle upon terms of a class settlement to resolve the above-captioned matter, the related litigation captioned *Jane Smith et al. v. United Healthcare Insurance Company et al.*, Case No. 4:18-cv-06336-HSG (N.D. Cal.), and related investigations of OHI and its affiliates by the U.S. Department of Labor (“DOL”) and Office of the New York Attorney General (“NYAG”).

The parties anticipate that, within approximately the next 45 days, (i) the parties in this case, the parties in the *Jane Smith* case, and the DOL and NYAG will finalize a stipulation of settlement; (ii) the parties in the *Jane Smith* case will move to transfer that case and consolidate it with the above-captioned case in this Court for purposes of submission and approval of a consolidated class settlement; and (iii) the parties in this case and the parties in the *Jane Smith* case will jointly move this Court for preliminary approval of the class settlement.

Accordingly, the parties hereby jointly move this Court to stay all proceedings in this case, including, but not limited to, OHI's pending Motion for Protective Order (ECF No. 93), pending submission by the parties of a stipulation of class settlement and motion for preliminary approval thereof.

In light of the agreement in principle, the parties also respectfully request that the Court vacate the status conference currently scheduled for May 3, 2021.

Dated: New York, New York
April 30, 2021

Respectfully submitted,

By: /s/ Andrew N. Goldfarb

By: /s/ Michael W. Lieberman

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